

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

| Plaintiffs' Executive Committee for Personal Injury and Death Claims | Plaintiffs' Executive Committee for Commercial Claims |
|--|---|
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| Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC | J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR |

VIA ECF

January 11, 2021

The Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Plaintiffs today are filing the redacted papers relating to the motion to compel a further oral deposition of Akram Alzamari, ECF No. 6153 *et seq.* and ECF No. 6155 *et seq.*, pursuant to this Court's prior orders. See ECF No. 6569. All counsel met and conferred on several occasions to discuss areas of dispute, which narrowed their disagreements about specific redactions.

Plaintiffs continue to assert their standing objection to the Federal Bureau of Investigation's protective order, which they believe to be overbroad, as well as to any restriction to public access concerning Mr. Alzamari, who was a percipient witness to certain key activities engaged in by the first two September 11, 2001 hijackers to arrive in the United States.

Notwithstanding the standing objections, in order to facilitate public access to the filings, Plaintiffs have consented to all of the redactions that the FBI asserted were still necessary under its protective order following the meet-and-confers, as well as the additional redaction (to ECF No. 6224-5 at 7) that counsel for Mr. Alzamari claims falls within the scope of this Court's October 28, 2019 order requiring that any discussion of certain of Plaintiffs' questions remain under seal (*see* ECF No. 5233.)

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Respectfully submitted,

KREINDLER & KREINDLER

/s/ Megan W. Benett

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

COZEN O'CONNOR

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MDL 1570 Plaintiffs' Exec. Committee
for Commercial Claims

cc: All counsel of record via ECF

MOTLEY RICE

/s/ Robert T. Haefele

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims